

EXHIBIT B

MONICA HOPKINS
February 9, 2015

Page 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MONICA HOPKINS,

Plaintiff,

vs.

U.S. District Court No.

2:14-CV-13482

Hon. Victoria A. Roberts

Mag. Judge David R. Grand

FORD MOTOR COMPANY,

Defendant.

The Videotaped Deposition of MONICA HOPKINS,
Taken at 280 North Old Woodward, Suite 400,
Birmingham, Michigan,
Commencing at 9:18 a.m.,
Monday, February 9, 2015,
Before Alison C. Matthes, CSR-6266, RPR.

MONICA HOPKINS
February 9, 2015

Page 2

1 APPEARANCES:

2

3 RAFFI J. BUSH

4 Romano Law, PLLC

5 23880 Woodward Avenue

6 Pleasant Ridge, Michigan 48069

7 248.750.0270

8 rbush@romanolawpllc.com

9 Appearing on behalf of the Plaintiff.

10

11 THOMAS J. DAVIS

12 Kienbaum, Opperswall, Hardy & Pelton, PLC

13 280 North Old Woodward Avenue

14 Suite 400

15 Birmingham, Michigan 48009

16 248.645.0000

17 tdavis@kohp.com

18 Appearing on behalf of the Defendant.

19

20

21 ALSO PRESENT:

22 William Dunbar, Video Technician

23

24

25

MONICA HOPKINS
February 9, 2015

Page 41

1 A. I'd have to see.

2 Q. Okay. And you stated that some of these you did from
3 home; correct?

4 A. Just went online, yes.

5 Q. Okay. What sites did you go to online, if you recall?

6 A. Just looked for different -- just looked for different
7 jobs, anything and everything online.

8 Q. Okay. And did you search through your emails or your
9 computer to see if you had copies of resumes, copies
10 of cover letters, email confirmations from job posting
11 sites or from company Web sites saying thank you for
12 submitting an application, anything of that nature?
13 Did you look for those sort of things?

14 A. No, I did not.

15 Q. Okay. All right. I'm going to ask that Mr. Raffi
16 speak with you about doing that because those would be
17 responsive, I think, to this -- this RFP.

18 MR. DAVIS: Okay?

19 BY MR. DAVIS:

20 Q. And then your lawyers can supplement it with what you
21 find. I'd also ask you to -- to take one -- go one
22 page back to page 7 and look at number 18 there.

23 A. Page 7, you said?

24 Q. Page 7, number 18. Correct.

25 Please just take a look at that; let me

MONICA HOPKINS
February 9, 2015

Page 42

- 1 know when you're done.
- 2 A. Okay.
- 3 Q. Okay. Do you not retain copies of your tax records?
- 4 A. I do not.
- 5 Q. Okay. Where do you keep copies of your tax records
- 6 at?
- 7 A. I don't have copies of my tax records. I called and
- 8 they were closed down for the month of January.
- 9 Q. You called who?
- 10 A. The tax -- the Federal Government.
- 11 Q. Okay. Well, when you -- you filed taxes between 2006
- 12 and 2014; correct?
- 13 A. Correct.
- 14 Q. Okay. And do you file them yourself, or do you file
- 15 them with a company like H&R Block, or with something
- 16 like that?
- 17 A. With somebody.
- 18 Q. Do you know who?
- 19 A. His name offhand -- I do not know his name offhand.
- 20 Q. Okay. Did you contact -- attempt to contact this
- 21 individual and obtain copies of your tax returns?
- 22 A. You're talking about this year?
- 23 Q. For any of the years that are listed in this --
- 24 A. No, I didn't.
- 25 Q. Okay. And you -- you -- you know that you're supposed

MONICA HOPKINS
February 9, 2015

Page 43

1 to at least keep seven years of tax records just in
2 case you get audited; is that right?

3 A. They don't have them? Like, the Government doesn't
4 have them?

5 Q. Well, I -- I'm sure they do. But my question is, do
6 you -- you don't personally retain copies of your own
7 tax records in case of an audit?

8 A. No.

9 Q. Okay. I assume, now -- that it's now February 2015
10 and you're going to have taxes due in April. Are you
11 planning on going to the same individual for your --

12 A. Yes.

13 Q. And, again, I guess I would just ask -- well,
14 actually, one more question. You say that you agreed
15 to sign appropriate authorizations provided by
16 defendant to obtain these records.

17 A. Yes.

18 Q. What do you -- what are you referring to there?
19 You'll -- are you saying that you're going to sign
20 documents that would let us obtain these documents
21 directly from the Federal Government?

22 A. Yes.

23 Q. Okay. All right. Well, we may need to have you sign
24 that, but I would ask --

25 MR. DAVIS: Mr. Raffi, I think those are --

MONICA HOPKINS
February 9, 2015

Page 44

1 would be in her possession or her control if she
2 can -- if they're being retained by her tax preparer
3 and if she gets copies from them, I think that would
4 be the first step.

5 MR. BUSH: Yeah, we can -- we can look into
6 that for sure.

7 MR. DAVIS: Okay. All right.

8 BY MR. DAVIS:

9 Q. Let's move on.

10 Have you ever been involved in any lawsuit
11 apart from this one?

12 A. You're talking -- can you say that question again?

13 Q. Have you ever been -- well, let me ask you this: Have
14 you ever been sued by anybody before or have you ever
15 sued anyone before, either alone or together with
16 somebody else?

17 A. I have never been sued by anybody. Excuse me. And
18 have I ever sued anyone? Back -- gosh, I was really
19 young. I don't -- yes, but I don't remember when it
20 was.

21 Q. You sued somebody in the past?

22 A. Yes.

23 Q. Who did you sue?

24 A. Like, a company? No, it was a person.

25 Q. Over what?

MONICA HOPKINS
February 9, 2015

Page 116

1 mind, I -- I found the name in the Spine, PLLC.

2 THE WITNESS: Oh, it could be.

3 MR. BUSH: Just to make it easier. It
4 looks like it's Dr. Jeff Pierce.

5 THE WITNESS: Oh, yes. In the one, two,
6 three -- fourth paragraph.

7 BY MR. DAVIS:

8 Q. Dr. Pierce was who? He was the doctor who gave you --

9 A. Epidural steroid injections.

10 Q. Okay. Do you have any documentation from him?

11 A. I could get some. I don't have any.

12 Q. Okay.

13 MR. DAVIS: Well, Raffi, that's probably
14 under her control, as well, so we would ask that that
15 be produced.

16 BY MR. DAVIS:

17 Q. Well, let me ask you that.

18 How did you come to visit that doctor who
19 gave you steroid injections? Dr. Pierce?

20 A. Crawford, Kevin Crawford.

21 Q. Okay. Do you remember when the first time it was that
22 you went to him for steroid injections?

23 A. I don't know if it was in October or November. The
24 ending of October, the beginning of November.

25 Q. But after you had left work?

MONICA HOPKINS
February 9, 2015

Page 128

1 before?

2 A. Yes.

3 Q. Okay. What is the name of your chiropractor?

4 A. Oh, I don't know offhand.

5 Q. Okay. Do you know where his office is?

6 A. Yes. It's in Taylor, I believe. It might be
7 Allen Park, but I think it's in Taylor.

8 Q. Okay. Is that something that, if we sent a request,
9 that you would be able to figure out who he is and
10 give us his name and address?

11 A. Yes.

12 Q. Okay. And when did you first start going to a
13 chiropractor?

14 A. I don't -- I don't have a clue.

15 Q. Okay.

16 A. I don't even know what year or anything.

17 Q. Okay. It was prior to you starting at Ford; correct?

18 A. Yes.

19 Q. Was it for back pain?

20 A. My whole body.

21 Q. Your whole body. Okay.

22 Did you ever have back pain before you were
23 working at Ford?

24 A. Like, have I ever had pain in my back before?

25 Q. Correct.

MONICA HOPKINS
February 9, 2015

Page 146

1 kind of lifted your leg kind of straight up 90 degrees
2 to see what your reaction was?

3 A. I don't remember any of that.

4 Q. You don't remember any of that?

5 A. No.

6 Q. But you would have no reason to dispute that, if
7 that's what the records indicated?

8 A. I don't remember.

9 Q. Okay.

10 A. I just know I was in a lot of pain.

11 Q. Okay. And Dr. Deguzman asked you to -- is this the
12 date -- if you look on the next page, page 19, you see
13 there, under Plan Treatment, it says, "Continue ice
14 application, start on LS exercises, given sheet
15 instructions."

16 Do you see that?

17 A. Yes.

18 Q. So, Dr. Deguzman gave you a sheet for exer- -- to do
19 exercises to help your back; is that correct?

20 A. Yes.

21 Q. Okay. What were those? Do you remember what it was?

22 A. I have it at home. They're just, like, stretches.

23 Q. Okay.

24 MR. DAVIS: Raffi, that's also something
25 that would have been responsive to our request. Why

MONICA HOPKINS
February 9, 2015

Page 147

1 don't you check that and see if we can get that
2 produced?

3 BY MR. DAVIS:

4 Q. Let's see --

5 A. It was something that he printed off the computer.

6 Q. Okay. And you -- but you have a copy at home?

7 A. I don't know if I have it, but --

8 Q. Okay. But you'll -- you'll, at least, look for it?

9 A. I'll look.

10 Q. Okay. Now, there were points -- there were -- there
11 were points where you felt that it was feeling better
12 on some days than others; correct?

13 A. It never went away. Some days were not as painful as
14 others.

15 Q. Okay. But you did, on some occasions, tell the nurse,
16 at least, that you felt that it was starting to get
17 better?

18 A. Some of the pain was starting to go away.

19 Q. Okay.

20 A. At home.

21 Q. Okay. Well, let's turn to page 20. Do you see it
22 says -- it's dated 7-19-2013 at 15:28, and it's 00
23 seconds. Do you see that?

24 A. Yeah, I see that.

25 Q. Okay. And, then, it's subjective, and personal